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13 **UNITED STATES DISTRICT COURT**
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15 **NORTHERN DISTRICT OF CALIFORNIA**
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17 **SAN FRANCISCO DIVISION**

18 SECURITIES AND EXCHANGE
19 COMMISSION,

20 Plaintiff,

21 v.

22 EADGEAR, INC., EADGEAR HOLDINGS
23 LIMITED, CHARLES S. WANG, FRANCIS
24 Y. YUEN, AND QIAN CATHY ZHANG,

25 Defendants,

26 LAURATA P. CHAN,

27 Relief Defendant.
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Case No. 3:14-cv-04294-RS (KAW)

**STIPULATION AND ~~PROPOSED~~ ORDER
TO CONTINUE SETTLEMENT
CONFERENCE**

DATE: MAY 29, 2014

TIME: 11:00 A.M.

HONORABLE KANDIS A. WESTMORE

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STIPULATION AND ~~PROPOSED~~ ORDER

The Plaintiff Securities and Exchange Commission (the “SEC”), together with Defendants eAdGear, Inc., eAdGear Holdings Limited, Francis Yuen, Charles Wang and Cathy Zhang, and Relief Defendant Laurata Chan, through their respective counsel, respectfully submit the following Stipulation and Proposed Order to continue the Settlement Conference in this matter:

WHEREAS a request for referral to a Magistrate Judge was jointly requested by the parties in the Joint Case Management Conference Statement, dated March 5, 2015 (Docket No. 65) and Ordered by this Court following the Case Management Conference on March 12, 2015;

WHEREAS it was stipulated in that Joint Case Management Conference Statement that Defendants’ initial disclosures as well as related discovery deadlines were should be extended due (in part) to the pendency of a related criminal case involving Defendants Wang and Yuen (CR 14-488 YGR), and corresponding Fifth Amendment concerns, as well as to assist with possible settlement of the case;

WHEREAS the requests for an extension of the Defendants’ initial disclosures and related discovery deadlines were granted and a further Case Management Conference was set for November 5, 2015 and Jury trial set for February 8, 2016

WHEREAS in the related criminal matter, Defendants Wang and Yuen have a currently set Change of Plea date for May 27, 2015;

WHEREAS the Settlement Conference is currently scheduled for May 29, 2015, pursuant to the Notice of Settlement Conference and Settlement Conference Order dated March 13, 2015 (Docket No. 71);

1 WHEREAS at least one party's counsel is unavailable and out of the state on May 29,
2 2015;

3 ACCORDINGLY, it is HEREBY STIPULATED by and between the undersigned
4 parties through their respective counsel that the Settlement Conference shall be moved to Friday
5 August 21, 2015 at 11:00 a.m. Each other date set forth in the Court's Notice of Settlement
6 Conference and Settlement Conference Order shall be continued accordingly.
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9 Dated: April 24, 2015

Respectfully submitted,

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11 /s/

Susan F. LaMarca
Jessica W. Chan
Robert Tashjian
Attorneys for the Plaintiff Securities and Exchange
Commission
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16 /s/

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23 /s/

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_____/s/_____
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ATTESTATION

I, Adam Pennella, am the ECF User whose identification and password are being used to file the Stipulation and Proposed Order. I hereby attest that each of the above parties or their representatives concurs in this filing.

Dated: April 24, 2015

_____/s/ Adam Pennella_____
Adam Pennella

~~PROPOSED~~ ORDER

Good cause appearing from the above Stipulation, the requested continuance of the Settlement Conference is hereby GRANTED.

IT IS HEREBY ORDERED THAT the Settlement Conference shall be moved to Friday, August 21, 2015, at 10:00 a.m.

IT IS SO ORDERED.

DATED: 4/27/15


Kandis A. Westmore
UNITED STATES MAGISTRATE JUDGE